

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ABC CORPORATION,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A",

Defendants.

Case No. 23-cv-3301

DECLARATION OF SOFIA QUEZADA

1. My name is Sofia Quezada.
2. I am an attorney at the law firm of Aronberg Goldgehn Davis and Garmisa, located at 225 W. Washington St. Ste. 2800 Chicago, IL 60606. I am duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiff ABC Corporation ("Plaintiff"). Unless expressly stated otherwise, I have personal knowledge of the facts stated herein, and, if called upon, I could and would testify fully as to them.
3. I am familiar with the website SellerDefense.cn, excerpts of such website attached hereto as Exhibits A and B.
4. SellerDefense monitors cases in this district and posts articles every time that a trademark, patent, or copyright infringement case is filed against foreign infringers.
5. Each article on SellerDefense's website lays out the detail of each case, including the intellectual property at issue, the date the case was filed, the Plaintiff, and the Plaintiff's law firm.

6. I visited SellerDefense.cn on May 24, 2023 and captured the screenshots that are shown in Plaintiff's memorandum. I can attest to the accuracy of the screenshots.
7. One article I read on SellerDefense pertained to Case No. 23-cv-3230, CoulourPop Cosmetics LLC v. The Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations Identified on Schedule A to the Complaint.
8. I searched the docket for the above case and confirmed that it was filed on May 23, 2023, just one day prior to the SellerDefense article being posted.
9. I can confirm that the case was not filed under a pseudonym.
10. At the time of my search, the SellerDefense article pertaining to the above case already had 152 views within one day of the case's filing.
11. Due to my experience with these cases, it is likely that many of the Defendants in the action will drain their assets that are attachable within U.S. jurisdiction and escape liability for their actions.
12. Websites like SellerDefense assist infringers and encourage them to work together to escape liability.
13. SellerDefense includes information on its website on how to join chat rooms on both QQ.com and WeChat that monitor infringement litigation in this district.
14. SellerDefense is just one source that strictly monitors these cases being filed, on belief there are others.
15. Having the Plaintiff proceed as a pseudonym is critical to preserve any possibility of redress of harm to Plaintiff.

I declare under penalty of perjury under the laws of the United States of America that the foregoing
is true and correct.

Executed: May 25, 2023

Signed: /s/ / Sofia Quezada

Printed: Sofia Quezada

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